

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Bridging the Digital Divide for Low-Income Consumers)	WC Docket No. 17-287
)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
)	
Telecommunications carriers Eligible for Universal Service Support)	WC Docket No. 09-197
)	
)	

COMMENTS OF SMITH BAGLEY, INC.

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SUMMARY

As set forth herein, the territory served by Smith Bagley, Inc. (“SBI”) includes some of the most difficult in the nation, with population density, poverty, unemployment, and health care related challenges all ranking near the bottom statistically. Several counties within SBI’s service area top the list of 100 “Priority One Critical Need Counties” as released by the Commission’s Connect2Health Initiative.

Over the years, legacy high-cost support and Lifeline have enabled SBI to build over 200 new cell sites in remote Tribal lands and near-reservation areas. On these vast Tribal lands, wireless networks built to today’s level of telecommunications service would not have been deployed without federal universal service support, nor is there any realistic possibility that these networks will be maintained and improved without a comprehensive universal service support mechanism.

SBI opposes the idea of halting Lifeline enrollments because a state is delayed in implementing its verifier.

SBI opposes the idea of limiting Lifeline benefits to broadband service provided over facilities-based broadband networks that also support voice service.

SBI believes all carriers should be required to offer devices that are Wi-Fi and hotspot capable, but a carrier should not be required to only sell such devices. Many of SBI’s customers do not want such features and should not be required to purchase them.

SBI supports the FCC’s proposal to move to risk-based auditing, as a means of targeting scarce government resources.

To improve accountability, the Commission should limit third-party agents. If commissions are to be paid for selling service, they should be limited to Lifeline providers' employee-agents.

SBI opposes the Commission's proposal to limit use of the Independent Economic Household ("IEH") worksheet only when a consumer shares an address with other subscribers already enrolled in the Lifeline program, at least on Tribal lands. In SBI's case, the US Postal service has no addressing system throughout much of the Navajo Nation, making the IEH worksheet an important tool in every new customer relationship.

In nearly 20 years of Lifeline participation, SBI has never had a case of fraud by its employees or any other issue with distributing phones at the point of purchase. With customers having to travel sometimes 100 miles or more, and having no home mail delivery, SBI and similarly situated carriers must be able to distribute handsets at the point of sale.

SBI opposes a cap on the Lifeline program and a cap on the maximum discount level, and a household benefit limit, none of which serve the purpose of Lifeline or the interests of eligible citizens.

SBI believes the most efficient way to increase broadband on Tribal lands is to increase Tribal Lifeline, conditioned upon the recipient carrier's committing to use all available support on capital and operating expenses to serve remote Tribal areas.

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COMMENTS OF SMITH BAGLEY, INC.

Smith Bagley, Inc. (“SBI”), by its counsel, hereby submits these Comments in response to the Commission’s *Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry*, in the above-captioned proceeding.¹

I. INTRODUCTION.

In a sweeping action, the Commission’s *Lifeline Order* has significantly advanced universal service reforms in the Lifeline program, while in the *NPRM* and *Notice*, the

¹ *Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 17-287, WC Docket No. 11-42, WC Docket No. 09-197, *Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry*, 32 FCC Rcd 10475 (2017) (referred to herein as “*Lifeline Order*”, “*NPRM*”, or “*Notice*”, as appropriate). The deadline for filing comments in response to the *NPRM* and *Notice* has been extended to February 21, 2018, by the Wireline Competition Bureau. *Bridging the Digital Divide for Low-Income Consumers*, WC Docket No. 17-287, Order, DA 18-62 (Jan. 23, 2018).

Commission proposes and seeks comment on further changes that could have far-reaching consequences for the industry, and low-income consumers.

For nearly two decades, SBI has advocated to the Commission on behalf of consumers in Tribal lands it serves, as a commercial mobile wireless operator in the “Four Corners” area of Arizona, New Mexico, Utah, and Colorado. SBI has built extensive wireless coverage, providing service to over 100,000 people, over 60,000 of whom live in low-income households on the Navajo, Hopi, White Mountain Apache, Zuni, and Ramah Navajo Tribal lands.² Residents on Tribal lands across the country often travel long distances to go to school or work, to purchase basic necessities, to receive medical care, and even to get their mail, which is held at the nearest post office.³ In many cases, a mobile device the only available means of communication, and in all cases, it is a true “lifeline” when a person leaves home. Oftentimes, a person is located many miles from the nearest home or business with a landline facility.

² See, e.g., Smith Bagley Comments before the Navajo Nation Telecommunications Regulatory Commission, Case No. NNTRC-11-001 (filed Oct. 13, 2011), at 1 (noting that “SBI has been proud to serve substantial portions of the Navajo Nation for over a decade as a licensed wireless service provider. In that time, SBI has invested millions of dollars in its infrastructure, going from just two cell sites to 67 on Navajo lands, plus a number of others on adjacent land that also serve the Nation. SBI plans to continue to invest in new towers and facilities and eventually it hopes to expand its wireless coverage to the farthest reaches of its licensed service area and tribal lands. Although the costs and challenges to serve the most remote areas in the Nation increase as SBI expands to ever more sparsely populated areas, each year SBI covers more tribal residents with its new towers and the company is committed to continue investing in the Navajo people.”), *accessed at* http://www.nntrc.org/uploads/FileLinks/6c1ccceefab048209eece9308b61ea03/2012_10_08_NNTRC_11_001_FNP_RM_SBI_Comments.pdf.

³ See, e.g., Partnership with Native Americans, South Dakota: Pine Ridge Reservation, (noting that “[m]any [Reservation] residents travel more than 120 miles ... for seasonal employment.... Medical care on the Reservation is inadequate, and many tribal members forego medical attention because of the long distance to medical facilities.”), *accessed at* http://www.nativepartnership.org/site/PageServer?pagename=PWNA_Native_Reservations_PineRidge.

As SBI has reported previously, poverty is endemic on many Tribal lands.⁴ Geographic and demographic challenges make SBI's Tribal service area exceptional for mobile wireless carriers – population densities less than 5 inhabitants per square mile across huge expanses, extremely poor demographics, very low business formation and economic activity, and oftentimes no access to high-speed connections needed to transport broadband traffic from cell sites to switches.⁵ A report prepared by the Arizona Rural Policy Institute, using 2010 Census data and 2010 American Community Survey estimates, indicates that:

Poverty rates on the Navajo Nation Reservation (38%) are more than twice as high as poverty rates in the State of Arizona (15%). Almost half (44%) of all children under 18 years of age are considered to be living in poverty, while one-third (34%) of tribal members between 18 and 64 also live in poverty. Almost one-third (29%) of persons living in families on the Navajo Nation live in poverty, twice the rate of families living in poverty in the State of Arizona (13%), for example. More than one-third of all persons over age 65 (39%) also live in poverty, five times higher than the State of Arizona (8%) for this age group.⁶

The Commission's Connect2Health initiative has examined lack of broadband, low Internet adoption, diabetes, obesity, preventable hospitalizations, median income, and population statistics to identify the 100 "Priority One Critical Need Counties" across the nation

⁴ See, e.g., SBI Comments, WC Docket No. 11-42, *et al.* (filed Aug. 31, 2015) ("SBI 2015 Comments"), at 3-4 (providing "documentation of the difficulties faced by people living on the Navajo, Zuni, Hopi, and Apache reservations"), accessed at <https://ecfsapi.fcc.gov/file/60001223965.pdf>.

⁵ SBI has previously explained the difficulties it faces in deploying reliable wireless service to consumers on Tribal lands, indicating that "[t]hese problems include long distances between homes and stores or other facilities, limited utilities and personal transportation options, the high number of people sharing housing in remote areas, and difficulties in meeting Lifeline program compliance rules caused by the lack of an adequate postal delivery service and postal addressing system." *Id.* at 6.

⁶ Arizona Rural Policy Institute, *Demographic Analysis of the Navajo Nation Using 2010 Census and 2010 American Community Survey Estimates* (2013), at 34 (unpublished).

that are most in need of private investment and coordinated public support.⁷ Apache County in Arizona and McKinley and Cibola Counties in New Mexico are all included on the Commission's priority list. Navajo County in Arizona would also have been listed, but for the fact that a very small portion of the county includes a summer resort area. Apache, Navajo, and McKinley Counties contain substantial Tribal lands, including Navajo, Zuni, Hopi, and White Mountain Apache lands. Cibola County includes part of the Zuni Tribe, the Acoma and Laguna Pueblos, and the Ramah of Navajo.

Demographically, these counties rank near the bottom of all counties in the United States in many categories, including per capita income, education, and unemployment. In its October 26, 2016, filing, SBI set forth substantial record evidence demonstrating that the Tribal areas it serves are dramatically different in character from ordinary rural areas in the Lower 48, and from most Tribal lands across the country.⁸ While incredible progress has been made to increase household telephone penetration rates over the past 16 years since the Tribal Lifeline program was initiated, as of 2016 **fully 15.6% of households on the Navajo Nation in**

⁷ See FCC, Connect2Health, *Critical Need Counties in Broadband & Health – Priority 100*, accessed at <https://www.fcc.gov/sites/default/files/Priority-100-Counties.pdf>.

⁸ Letter from David A. LaFuria, Counsel for SBI, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90, *et al.* (filed Oct. 26, 2016) ("SBI Letter") (public redacted version), accessed at <https://ecfsapi.fcc.gov/file/10261682207349/2016%201026%20SBI%20MFII%20Presentation%20PUBLIC%20VERSION.pdf>. SBI notes that the Census Data provided therein includes estimates that (1) 13.7% of households on the Navajo Nation do not have access to a vehicle; (2) 64.2% of households heat their dwellings with wood; (3) 18.5% lack complete plumbing facilities; and (4) 94.1% of renters pay less than \$1,000 per month, yet 22.2% pay over 33% of their gross income in rent.

AZ/NM/UT lack access to telephone service of any kind.⁹ While extraordinarily high compared to the nationwide average, this number represents an improvement from 39% in 2000.¹⁰

The combination of legacy high-cost support and Lifeline has enabled SBI to build over 200 new cell sites in remote Tribal lands and near-reservation areas, including upgrades to 3G throughout its network, and now 4G LTE technology in areas where this deployment has been deemed feasible with available support. SBI can state unequivocally that wireless networks built to today's level of telecommunications service would not have been deployed in these extremely high-cost and remote Tribal lands without federal universal service support, nor is there any realistic possibility that these networks will be maintained and improved without a comprehensive universal service support mechanism that is predictable and sufficient.

Broadband subscribership (and availability) on Tribal lands are much lower even than telephone subscribership. According to the Commission's most recently available data, Tribal lands are dramatically underserved with both wireline and wireless broadband. For example, in the *2016 Broadband Progress Report*, the Commission stated that 95% of the Tribal population in Arizona and 80% in New Mexico lacks access to fixed advanced telecommunications capability.¹¹ Attached as Exhibit 1 are selected excerpts from the Commission's National

⁹ See U.S. Census Bur., *American Factfinder*, accessed at https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_5YR_DP04&prodType=table.

¹⁰ See GAO, Report to Congressional Requesters, *Telecommunications – Challenges to Assessing and Improving Telecommunications for Native Americans on Tribal Lands*, GAO-06-189 (Jan. 2006), at 13, accessed at <https://www.gao.gov/new.items/d06189.pdf>.

¹¹ *Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act*, GN Docket No. 15-191,

Broadband Map, illustrating fixed and mobile broadband penetration in selected Tribal lands. While this information is becoming dated because the Commission has not updated the map, the figures therein are similar to those shown in the *2016 Broadband Progress Report*.

In sum, there is a lot of work to do on Tribal lands to make broadband services widely available and to ensure that they are reasonably comparable to those available in the rest of the nation. The Commission proposes some critical reforms that, if adopted, can have great consequence for people living on Tribal lands.

II. LIFELINE ENROLLMENTS SHOULD NOT BE CUT OFF IF A STATE IS DELAYED IN OPERATIONALIZING ITS VERIFICATION DATABASE.

The Commission seeks comment on whether to halt Lifeline enrollments in a state that does not get its verifier up and running on a timely basis.¹² SBI asks, respectfully, why punish poor citizens for the purported sins of a government agency, or the inability of technology workers to implement a verifier on a timely basis? Surely there is a carrot/stick approach that would not involve denying eligible low-income consumers a Lifeline benefit.

Any solution that cuts off benefits will impose costs on carriers, who will incur significant operational costs in providing assistance and information to consumers affected by a suspension of Lifeline enrollments. Accordingly, SBI believes the Commission should not halt enrollments because a state is delayed in implementing its verifier.

2016 Broadband Progress Report, 31 FCC Rcd 699, 770 (2016) ("*2016 Broadband Progress Report*"), at Appendix G, accessed at https://apps.fcc.gov/edocs_public/attachmatch/FCC-16-6A1.pdf.

¹² *NPRM*, 32 FCC Rcd at 10,497 (para. 60).

III. CONSUMERS TAKING SERVICE FROM FACILITIES-BASED CARRIERS MUST NOT BE DENIED LIFELINE BENEFITS BECAUSE THEY LIVE IN AN AREA SERVED THROUGH RESALE OR ROAMING.

The Commission asks whether Lifeline benefits should be limited to broadband service provided over facilities-based broadband networks that also support voice service. Lifeline providers would only receive Lifeline support for service provided over the last-mile facilities they own.¹³

SBI opposes this proposal, at least for wireless networks, and especially those operating on Tribal lands. As a wireless provider, SBI can say definitively that there are at least a few dead zones within its network where service is provided through a roaming/resale arrangement with another carrier. Consumers may live in one of these dead zones, yet use their phones throughout SBI's network. In the few cases where a consumer is served by a roaming agreement at home, the other wireless carrier oftentimes is not an eligible telecommunications carrier ("ETC"), precluding a consumer from switching to another facilities-based carrier.

As a policy matter, it is difficult to understand what purpose is served by denying otherwise eligible citizens a Lifeline benefit simply because they are served by more than one wireless network. In a wireless world, many or most consumers choose the network that best suits their needs throughout the area where their phone is used, not necessarily the residence. Any Lifeline funds received from such consumers are used in the same manner as any other Lifeline funds, to increase affordability for an eligible citizen and to improve SBI's facilities.

¹³ *Id.* at 10,499 (para. 67). The Commission explains that, "[u]nder this proposal, Lifeline providers that are partially facilities-based may obtain designation as an ETC, but would only receive Lifeline support for service provided over the last-mile facilities they own." *Id.*

Accordingly, at least on remote Tribal lands where SBI has experience, the Commission's proposal appears to be a solution in search of a problem. It would adversely affect "the availability of quality, affordable Lifeline broadband services"¹⁴

Additionally, Congress intended for ETCs to be eligible for support if they provide service through a combination of facilities and resale.¹⁵ SBI fully understands that if the Commission limits reseller participation in the Lifeline program, some may seek to become facilities-based providers by purchasing a single switch to serve the entire nation and reselling everywhere else. Such schemes can be prevented simply by requiring carriers to have facilities in each state where they serve, and to serve a certain number of customers, for example at least 50%, through their own last-mile facilities. This is far superior to making life more difficult for low-income rural citizens with limited Lifeline options.

IV. ALL CARRIERS SHOULD BE REQUIRED TO OFFER DEVICES THAT ARE Wi-Fi AND HOTSPOT CAPABLE, BUT NOT ALL DEVICES NEED BE.

SBI supports the Commission's proposal to remove the rule that requires that "all [Lifeline] devices are Wi-Fi enabled [and] capable of being used as a hotspot."¹⁶ However, these features are very important to many users, and carriers must continue to be required to provide them on at least one of the device models they offer to their customers. SBI has many

¹⁴ *Id.* at 10,499 (para. 68).

¹⁵ See Section 214(e)(1)(A) of the Communications Act of 1934, 47 U.S.C. § 214(e)(1)(A) (providing that an ETC must "offer the services that are supported by Federal universal service support mechanisms ... either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier)").

¹⁶ 47 CFR § 54.408(f)(1)-(3) (emphasis added), *quoted in NPRM*, 32 FCC Rcd at 10,504 (para. 81).

customers who simply need a phone to make emergency and other important calls. They should retain the ability to select less expensive devices. At the same time, all Lifeline consumers should have the option to select devices that are WiFi-enabled and capable of serving as a hotspot.

V. SBI SUPPORTS A MOVE TO RISK-BASED AUDITING.

The Commission seeks comment on moving to a risk-based auditing methodology, under which “the Wireline Competition Bureau and Office of Managing Director, with support from USAC [the Universal Service Administrative Company], would establish risk factors to identify the companies required to complete the biennial independent audits.”¹⁷ In light of its own experience, SBI supports a shift to the use of “a purely risk-based model of targeted Lifeline audits.”¹⁸

Since SBI became an ETC seventeen years ago, it has been audited fifty (50) times, including thirty-three (33) Lifeline audits. Throughout its participation in the program, SBI has never been the subject of an audit that resulted in significant findings of noncompliance or liability.

To be clear, audits have an important and salutary benefit. Working with USAC staffers, who have provided helpful guidance over the years, SBI personnel have gained an extensive understanding of the Commission’s rules and rule changes, and this has enabled SBI to improve

¹⁷ *NPRM*, 32 FCC Rcd at 10,505 (para. 86).

¹⁸ *Id.*

its regulatory compliance. That said, returns diminish quickly and repetitive audits are not productive for either the FCC or a carrier. It is highly unlikely that in 33 Lifeline audits the Commission has recovered anywhere near the amount of public funds expended in conducting these audits. And for a small company such as SBI, numerous FCC audits present a significant burden on personnel diverted from their normal business activities, which include providing service and assistance to SBI's customers.¹⁹

Accordingly, SBI fully supports an audit mechanism that focuses the Commission's resources toward carriers that either have no record of compliance or have demonstrable problems, while auditing carriers with multi-year records of compliance less often. SBI agrees with the Commission's view that "this approach would be more efficient and more effective at rooting out waste, fraud, and abuse in the program because the identified risk factors would better target potential violations than merely focusing on companies receiving large Lifeline disbursements."²⁰

VI. SBI SUPPORTS LIMITING AGENT COMMISSIONS.

SBI supports prohibiting commissions to third-party agents.²¹ SBI does not use third parties to sell its services because the costs of any non-compliance, and the difficulties and

¹⁹ See *id.* at 10,505 (para. 87) ("seek[ing] comment on the impact and burdens the current audit program imposes on providers").

²⁰ *Id.* at 10,505 (para. 86).

²¹ *Id.* at 10,506 (para. 91) (seeking comment on "prohibiting agent commissions related to enrolling subscribers in the Lifeline program").

expense associated with attempting to train outside parties in the nuances of the Lifeline rules, are very high.

If commissions are to be paid for selling service, they should be limited to Lifeline providers' employee-agents. Employees can be trained and a carrier can be held accountable for their conduct. SBI has several employees who receive commissions and in nearly twenty years of Lifeline participation SBI has never had a compliance problem. The rare employee who does not follow the rules does not receive commissions, which greatly improves a person's willingness to respond to training. SBI therefore disagrees with the Commission's apparent assumption that the use of sales commissions is problematic regardless of whether an ETC pays commissions to its own sales employees or to contractors acting as agents of the ETC.²²

VII. THE INDEPENDENT ECONOMIC HOUSEHOLD WORKSHEET IS AN IMPORTANT TOOL FOR SBI ON TRIBAL LANDS.

SBI opposes the Commission's proposal to limit use of the Independent Economic Household ("IEH") worksheet only when a consumer shares an address with other subscribers already enrolled in the Lifeline program, at least on Tribal lands.²³ Such a limitation would disserve low-income consumers living on Tribal lands by unnecessarily complicating their efforts to establish eligibility for Lifeline support.

As SBI has stated many times, the vast majority of the Navajo Nation is not served by the U.S. Postal Service ("USPS"), that is, there is no USPS addressing system and no home

²² *See id.*

²³ *Id.* at 10,508 (para. 98).

delivery.²⁴ Citizens living in these vast areas provide SBI with a descriptive address, enabling SBI to locate a residence. However, the use of descriptive addresses makes it extraordinarily difficult to know whether two households share the same dwelling, as descriptions of the same home can vary among applicants. To overcome this problem, SBI uses the IEH worksheet as a part of its sign-up process – it is hard coded into SBI’s electronic sign up forms – in order to better flag the issue and minimize program waste.

Accordingly, SBI does not believe limiting use of the IEH worksheet as suggested by the Commission will be helpful, at least not on Tribal lands. The Commission’s view is that a “prophylactic” use of the IEH worksheet – in which “an ETC collects an IEH worksheet from all subscribers regardless of whether another Lifeline subscriber resides at the same address” – is problematic because it “can ... subvert the duplicate address protections and may result in increased waste, fraud, and abuse.”²⁵

This view expresses a concern that is merely speculative, particularly in the case of Lifeline subscribers living on Tribal lands. SBI’s use of IEH worksheets for all residents of Tribal lands seeking Lifeline benefits serves the twin purposes of mitigating problems related to the use of descriptive addresses supplied by Tribal residents, and of helping to determine whether

²⁴ See, e.g., SBI 2015 Comments at 28 & n.60 (noting that, on some Tribal lands, including Navajo Nation, there is no USPS addressing system in place, and further explaining that, “on Navajo lands ... Postal Service ZIP Codes generally provide little guidance in determining where SBI’s Lifeline customers actually reside. The 86503 ZIP Code for Chinle, Arizona, for example, is shared with Rough Rock Trading Post, located approximately 30 miles northwest of Chinle. Lifeline subscribers may list the Chinle ZIP Code, but reside in or near communities, such as Del Muerto and Pinon, that are located up to 45 miles from Chinle.”).

²⁵ *NPRM*, 32 FCC Rcd at 10,509 (para. 98).

multiple independent households reside at the same residence. SBI's use of the IEH worksheets thus helps to minimize – not increase – the risk of waste, fraud, and abuse.

VIII. CARRIERS SERVING TRIBAL LANDS MUST BE ABLE TO DISTRIBUTE HANDSETS AT THE POINT OF SALE.

The Commission asks whether handset distribution at the point of sale should be prohibited, and whether there should be exceptions.²⁶ If such a prohibition is adopted, it should not apply to Tribal lands. While TracFone's characterization of the problems associated with point-of-sale distribution of handsets might be credible in certain contexts, it has no application to the distribution of handsets to consumers living on Tribal lands.

On remote Tribal lands, some people travel over 100 miles to enter an SBI store. In other cases, SBI's representatives travel great distances to bring mobile stores to remote areas. In either case, a consumer signing up for service, or renewing service, must be able to receive a handset, along with proper training, at the point of sale. It is a complete non-starter for SBI to mail a phone to a customer after the customer is Lifeline-qualified, knowing that its customer may not pick up mail at its post office for a week or more after it is delivered.

²⁶ *Id.* at 10,510 (para. 101). TracFone Wireless, Inc. ("TracFone"), whose proposal to ban point-of-sale handset distribution is cited by the Commission, opines that:

The spectacle of sales agents literally handing out phones on street corners, outside government assistance offices, in front of churches, out of car trunks, etc. has been the source of many news reports critical of the program. Not only is this practice difficult to police and conducive to fraud it has tarnished the perception of an important program which has been invaluable to low-income families and which is helping to bridge the digital divide.

Letter from Mitchell F. Brecher, Counsel for TracFone Wireless Inc., to Marlene Dortch, Secretary, FCC, WC Docket No. 17-287, *et al.* (filed Nov. 9, 2017), Attach. B at B-1, *cited in NPRM*, 32 FCC Rcd at 10,510 (para. 101 n.211).

In nearly 20 years of Lifeline participation, SBI has never had a case of fraud by its employees or any other issue with distributing phones at the point of purchase. The company has borne the losses caused by consumers' dishonesty, and has minimized these losses by utilizing rigorous up-front processing procedures. As the Commission's processes improve, this issue should be even less of a problem in the future, making this all but a non-issue.

IX. THERE SHOULD NOT BE A CAP ON LIFELINE.

The Commission proposes a hard cap on Lifeline to limit program growth, relying on the rationale that a "self-enforcing" budget would prevent undue burdens on ratepayers and ensure efficient use of limited funds.²⁷

Yet, Congress has never mandated a cap, but only urged the Commission to ensure that there are in place "specific, predictable and sufficient Federal and State mechanisms to preserve and advance universal service."²⁸ If a person is legitimately eligible to receive a Lifeline benefit, why should that person be denied support? How does denying a person Lifeline support "advance" universal service?

It is not unreasonable for the Commission to seek a fair balance between the needs of Lifeline funding recipients and the level of universal service contributions passed on to ratepayers. Nonetheless, the Commission should avoid any approach that works to the

²⁷ *NPRM*, 32 FCC Rcd at 10,510-11 (para. 105).

²⁸ 47 U.S.C. § 254(b)(5).

detriment of low-income consumers in all regions of the country who depend on the Lifeline program as a means of obtaining access to affordable communications services.²⁹

If, nonetheless, the Commission decides to impose a cap, SBI asks that Tribal lands be given special consideration or an exemption from the cap, in light of the extraordinary costs of serving such areas and the extraordinary poverty and demographics that are unique to Tribal lands, as set forth above. SBI's capital and operating budget planning are completely dependent upon the availability of federal high-cost and Lifeline support and the predictability of funding levels. Without those two line items, millions of dollars in capital expenditures from SBI's own resources would be crossed off the ledger, because the business case for deployment and operations on Tribal lands would be undercut if SBI's own expenditures could no longer be supplemented by universal service support.

Accordingly, Tribal lands must be given some special consideration, or an exception, if a hard cap on Lifeline support is adopted.³⁰

²⁹ See *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, *et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962, 3964 (para. 4) (2016). It is also helpful to keep in mind that the Commission has the authority to adopt universal service contribution reforms that would broaden the base of service providers making universal service contributions and, as a result, reduce the level of burdens faced by individual ratepayers. See, e.g., Ad Hoc Telecommunications Users Committee Comments, WC Docket No. 06-122, *et al.* (filed July 9, 2012), at 3-4 (explaining that "[t]he causes for the current [Universal Service Fund contribution] system's failures are well established As the contribution base of assessable telecommunications services shrinks, the contribution factor continues to rise. This embedded structural pattern distorts market behavior by encouraging migration to non-assessable services, leading to further reductions in the assessable base and required increases in the contribution factor.... Unless the Commission fundamentally reforms the basis for assessing USF contributions or dramatically expands the base of assessable services to create a level playing field among end-users and services, this pattern will continue.").

³⁰ SBI notes that the Commission also seeks comment on giving first priority to rural Tribal lands if Lifeline disbursements are projected to exceed the self-enforcing budget cap in a given funding year. *NPRM*, 32 FCC Rcd at 10,511 (para. 108). While such a prioritization would be justified, it would be wholly inadequate to meet the needs of low-income consumers residing on Tribal lands. Placing these consumers first in line for disbursements from a

X. SBI OPPOSES A MAXIMUM LIFELINE DISCOUNT LEVEL.

The Commission proposes a maximum discount level for Lifeline, “above which the costs of the service must be borne by the qualifying household.”³¹ Since the outset of its participation in Lifeline in 2001, SBI has charged consumers amounts varying between \$0.50 and \$1.00 per month for service. SBI continues to face challenges collecting funds from customers, primarily because most of the subscribers in its Tribal Lifeline customer base do not have checking or credit accounts. They are cash customers who often live far from SBI’s facilities, lack mail delivery service, and have few transportation options. SBI has employed strategies such as collecting \$12.00 in cash up-front for a 12-month contract, to minimize the need for customers to travel to stores each month to deliver cash payments.

In SBI’s experience, most of its Tribal customers cannot afford much more than \$1.00 per month for service. Thus, a maximum discount level would have a substantial negative impact on the affordability of service for these low-income Tribal customers.³² Accordingly, SBI favors continuing to permit carriers to offer service without a monthly charge, especially on Tribal lands.

It is important to note that in many urban areas, Wi-Fi is readily available to provide free voice and data service for Lifeline customers. On SBI’s Tribal lands, there is almost zero Wi-Fi service available outside of Window Rock, Arizona, and the immediate vicinity of local Navajo

capped pool of Lifeline support is not a formula for a funding mechanism that will advance universal service on Tribal lands.

³¹ *Id.* at 10,512 (para. 112).

³² *See id.* at 10,513 (para. 113).

Nation chapter houses. Consumers are forced to use the commercial mobile networks for all or almost all of their usage. Accordingly, a maximum discount rule would greatly prejudice consumers who lack a readily available free Wi-Fi option commonly found in public spaces throughout the rest of the United States.

XI. ADJUSTING SUPPORT ON TRIBAL LANDS.

In its *Notice of Inquiry*, the Commission asks how to adjust the Lifeline support amount to encourage affordable broadband access for low-income consumers in rural and rural Tribal areas.³³ In SBI's view, the most efficient way to encourage and expand broadband in remote areas is to increase Tribal Lifeline support, just as the Commission did back in the *2000 Tribal Lifeline Order*.³⁴ If the Commission is concerned about accountability, any extra support can be conditioned upon the recipient carrier's committing to use all available support on capital and operating expenses to serve remote Tribal areas.

In October 2016, SBI submitted to the Commission a capital and operating plan to significantly expand its service area and upgrade its network to 4G LTE technology, provided that the Commission increased Tribal Lifeline funding.³⁵ Execution of that plan in its entirety is dependent upon having additional support to work with.

³³ *Notice*, 32 FCC Rcd at 10,517 (para. 125).

³⁴ *Federal-State Joint Board on Universal Service, Promoting Deployment and Subscribership in Unserved and Underserved Area, Including Tribal and Insular Areas*, CC Docket No. 96-45, Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking, 15 FCC Rcd 12,208 (2000) ("*2000 Tribal Lifeline Order*"). As the Commission indicates in the *Notice*, the enhanced Tribal subsidy has not been raised since it was established in 2000. *Notice*, 32 FCC Rcd at 10,518 (para. 125 n.243) (citing Coeur D'Alene Tribe Reply, WC Docket No. 11-42, *et al.* (filed Sept. 30, 2015), at 3).

³⁵ See SBI Letter (confidential version contains specific investment amounts).

SBI notes that in its remote service areas, the low population density makes wireless broadband the only feasible terrestrial option. As SBI's network expands, more of its universal service support must be devoted to operating expenses and operating capex, to keep its network operational, and up to date.

Extension of 4G and 5G technologies will require installation of fiber to remote towers. Additional support could be utilized by SBI to hire subcontractors to install fiber, or lease fiber from existing providers. Such investments have significant multiplier effects in rural areas, as any fiber extension can be leveraged to reach remote schools and libraries through the E-Rate program, and health care facilities through the Rural Health Care Program. Excess capacity can be leased out to those seeking capacity for commercial purposes. These leveraged uses increase the network's utility and decrease its dependence on universal service support.

XII. A HOUSEHOLD BENEFIT LIMIT ON TRIBAL LANDS MUST BE REJECTED.

The Commission asks whether it should implement a benefit limit that restricts the amount of support a household may receive or the length of time a household may participate in the Lifeline program.³⁶ From SBI's perspective, such a proposal would disserve people living on Tribal lands. Poverty and unemployment levels remain extraordinarily high, and while increased telephone penetration has greatly improved the lives of Tribal residents, telephone service alone does not solve these problems.

If the Commission's suggestion of a benefit limit could transform the poverty and unemployment situation, it would be worth considering. There is nothing in the record,

³⁶ *Notice*, 32 FCC Rcd at 10,519 (para. 130).

however, that suggests that it would. In fact, the rapid introduction of telephone and mobile wireless services on Tribal lands has not dramatically decreased poverty and unemployment levels, because lack of communications services alone is not a significant factor. Denying essential services to this low-income population is not going to reduce poverty or unemployment because significant numbers of jobs on SBI's Tribal lands are not available to the unemployed.

The better course for the FCC is to allow larger federal and state programs aimed at poverty to lead on this issue. Reforms of federal and state welfare programs that remove people from low-income status and corresponding eligibility for Lifeline benefits is a much sounder course.³⁷ Moreover, the Commission's tools with respect to telephone and broadband service are not able to significantly affect poverty or unemployment. Instead, they provide a critical Lifeline and an opportunity for commercial business and educational facilities to thrive, setting the groundwork for future gains as businesses grow and educational levels improve.

Finally, the Commission's objectives that purportedly would be served by household benefit limits collide with the realities of life on Tribal lands. Specifically, the Commission surmises that imposing benefit limits would "encourag[e] broadband adoption without reliance on the Lifeline subsidy"³⁸ Such encouragement would fly in the face of the fact that large

³⁷ For example, were the federal government to replace some or all low-income programs with Universal Basic Income, the need for Lifeline could be reassessed. See, e.g., David Noonan, *Is Guaranteed Income for All the Answer to Joblessness and Poverty?* SCIENTIFIC AMERICAN (July 18, 2017), accessed at <https://www.scientificamerican.com/article/is-guaranteed-income-for-all-the-answer-to-joblessness-and-poverty/>.

³⁸ Notice, 32 FCC Rcd at 10,519 (para. 130).

numbers of consumers on the Tribal lands served by SBI simply cannot afford broadband service in the absence of Lifeline funding. Limiting household benefits would limit consumers' access to broadband.

The Commission also speculates that imposing benefit limits “would provide low-income households incentives to not take the subsidy unless it is needed....”³⁹ Again, the reality for many Tribal customers served by SBI is that the subsidy be needed indefinitely to enable these customers to afford broadband service. Thus, providing the incentives suggested by the Commission would be pointless. If the Commission were to impose benefit limits, it would be choosing to limit these customers' access to broadband service. Such a result would be in stark contrast to the Commission's intention to “continue[] its work to ensure that all Americans have access to, and can afford, the high-quality services that constitute advanced telecommunications capability.”⁴⁰

³⁹ *Id.*


⁴⁰ 2016 *Broadband Progress Report*, 31 FCC Rcd at 751 (para. 125).

XIII. CONCLUSION.

SBI thanks the Commission for the opportunity to provide these comments and looks forward to continuing reforms to the Lifeline rules for the benefit of low-income Tribal families.

Respectfully submitted,

SMITH BAGLEY, INC.

By: _____

David A. LaFuria
Steven M. Chernoff
John Cimko

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8300 Greensboro Drive, Suite 1200
Tysons, Virginia 22102
(703) 584-8678

February 21, 2018

EXHIBIT 1

EXCERPTS FROM NATIONAL BROADBAND MAP

Analyze » Summarize

Native Nations » ALL Native Nations

Below is a summary of the broadband characteristics for the area listed above. The broadband data below is as of June 30, 2014 and represents data collected by SBDD grantees. Click on the section headings to see more information.

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Wireline

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Speed	Percent Population	Nationwide
Dn>3Mbps Up>768kbps	62.1%	94.8%
Download > 3Mbps	65.7%	95.4%
Download > 6Mbps	57.1%	94.2%
Download > 10Mbps	52.4%	92.9%
Download > 25Mbps	37.5%	85.3%
Download > 50Mbps	29.4%	83.2%
Download > 100Mbps	21.9%	64.8%
Download > 1Gbps	7.0%	7.9%
Source		API Call

Wireless

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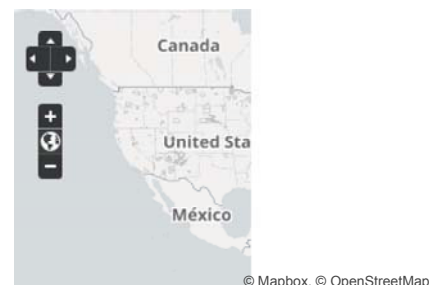
Speed	Percent Population	Nationwide
Dn>3Mbps Up>768kbps	86.4%	99.3%
Download > 3Mbps	86.4%	99.3%
Download > 6Mbps	79.5%	98.5%
Download > 10Mbps	77.8%	98.2%
Download > 25Mbps	14.3%	14.0%
Download > 50Mbps	11.7%	6.6%
Download > 100Mbps	11.6%	4.3%
Download > 1Gbps	0.0%	0.1%
Source		API Call

Technology	Percent Population	Nationwide
DSL	66.7%	90.0%
Fiber	12.8%	25.4%
Cable	31.5%	88.8%
Wireless	89.8%	99.4%
Other	0.0%	0.0%

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Demographics

Total area (sq miles)	111,169
Population	974,892
Housing Units	444,216

Age	Area (%)	Nationwide
under 5	7.47%	5.73%
5 - 19	26.94%	20.76%
20 - 34	21.62%	19.57%
35 - 59	26.41%	32.66%
60+	17.56%	21.28%

Race	Area (%)	Nationwide
White	37.32%	69.32%
Black	1.29%	11.19%
Hispanic	9.14%	14.91%
Asian/Pacific Islander	0.74%	4.08%
Native American	51.51%	0.48%

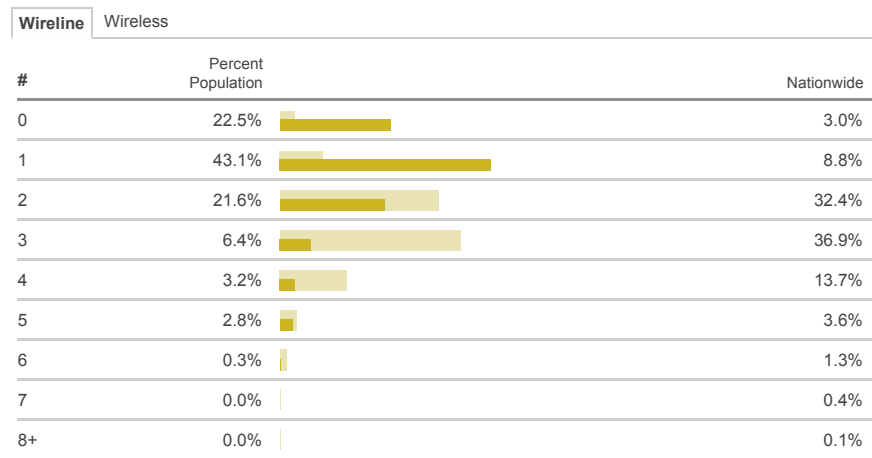
Income	Area (%)	Nationwide
Median income	\$41,570	\$58,811
Poverty rate	21.21%	15.81%
Below \$25k	34.64%	24.04%
\$25k-\$50k	27.17%	24.58%
\$50k-\$100k	27.01%	30.66%
\$100k-\$200k	9.65%	16.50%
\$200k or more	1.52%	4.21%

Education	Area (%)	Nationwide
High School graduate	72.11%	79.93%
Bachelor's degree or higher	12.76%	24.84%

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Source API Call

Number of Internet Providers



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Provider »

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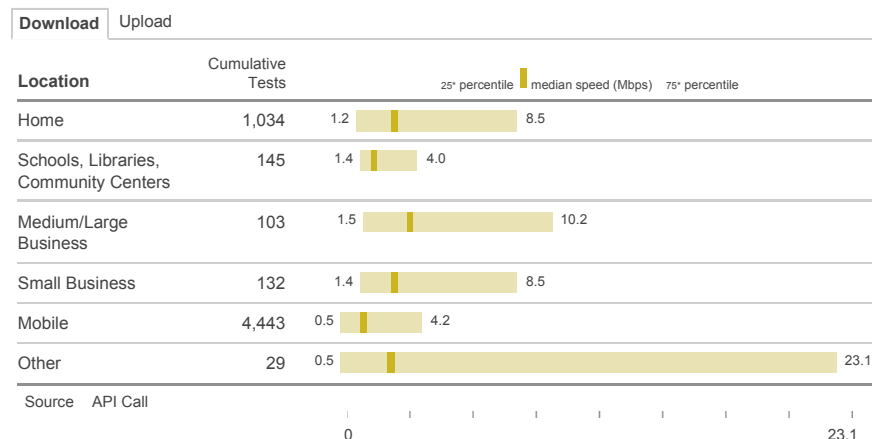
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Broadband Speed Test (Mbps)



Community Anchor Institutions

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Institution	Total Number of Records	Subscribe to Broadband			
		Yes	No	Not Provided	Speeds Reported
Schools K through 12	670	445	2	223	406
University, College, other post-secondary	68	31	0	37	29
Libraries	168	106	1	61	97
Medical / Healthcare	241	80	1	160	60
Public Safety	575	84	80	411	58
Community Centers - Government support	350	238	3	109	192
Community Centers - Non-Government support	98	41	0	57	36

Source API Call

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results: 6.51 seconds

Analyze » Summarize

Native Nations » Osage

Below is a summary of the broadband characteristics for the area listed above. The broadband data below is as of June 30, 2014 and represents data collected by SBDD grantees. Click on the section headings to see more information.

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Wireline

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Speed	Percent Population		Nationwide
Dn>3Mbps Up>768kbps	65.2%		94.8%
Download > 3Mbps	70.1%		95.4%
Download > 6Mbps	65.2%		94.2%
Download > 10Mbps	63.4%		92.9%
Download > 25Mbps	24.9%		85.3%
Download > 50Mbps	23.1%		83.2%
Download > 100Mbps	18.0%		64.8%
Download > 1Gbps	0.0%		7.9%
		Source	API Call

Wireless

<div>DownloadUpload</div>			
Speed	Percent Population		Nationwide
Dn>3Mbps Up>768kbps	99.9%		99.3%
Download > 3Mbps	99.9%		99.3%
Download > 6Mbps	96.0%		98.5%
Download > 10Mbps	95.6%		98.2%
Download > 25Mbps	0.0%		14.0%
Download > 50Mbps	0.0%		6.6%
Download > 100Mbps	0.0%		4.3%
Download > 1Gbps	0.0%		0.1%
		Source	API Call

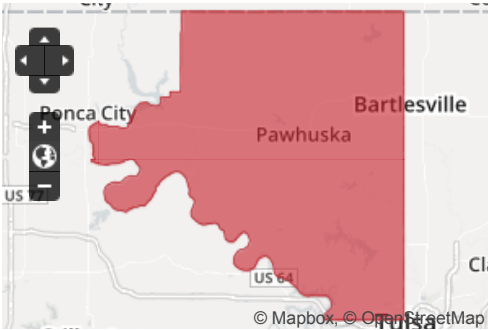
Technology	Percent Population		Nationwide
DSL	66.9%		90.0%
Fiber	1.8%		25.4%
Cable	52.7%		88.8%
Wireless	100.0%		99.4%
Other	0.0%		0.0%
		Source	API Call

Number of Internet Providers

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Demographics

Total area (sq miles)	2,225
Population	45,024
Housing Units	21,349

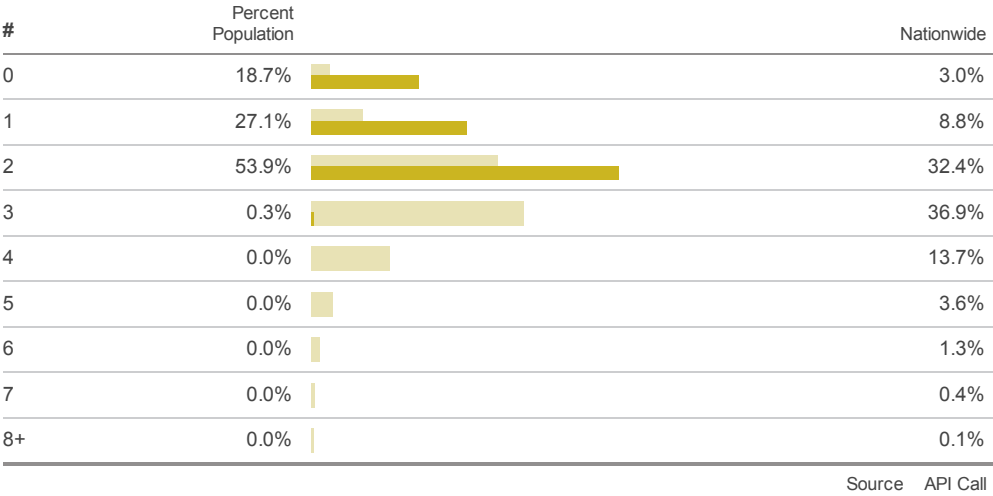
Age	Area (%)		Nationwide
under 5	3.72%		5.73%
5 - 19	22.32%		20.76%
20 - 34	18.97%		19.57%
35 - 59	28.53%		32.66%
60+	26.46%		21.28%

Race	Area (%)		Nationwide
White	72.20%		69.32%
Black	13.78%		11.19%
Hispanic	1.64%		14.91%
Asian/Pacific Islander	0.05%		4.08%
Native American	12.33%		0.48%

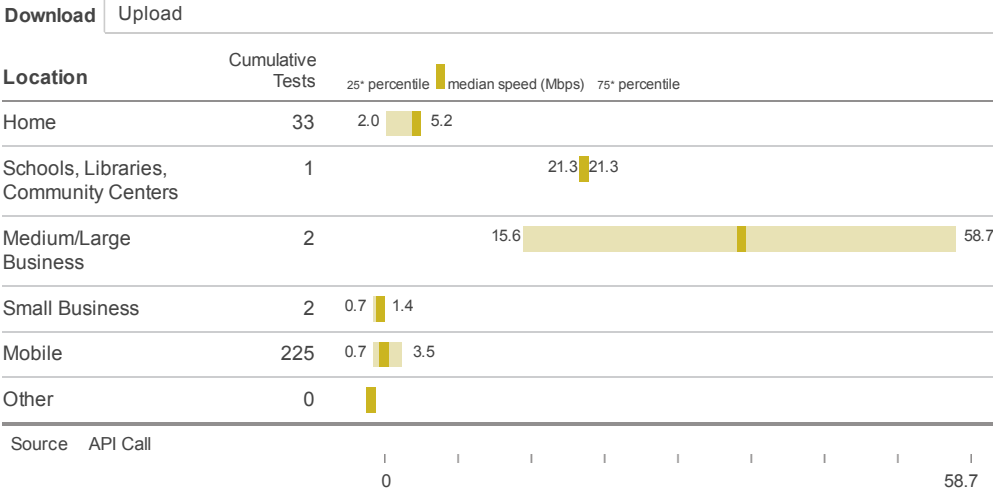
Income	Area (%)		Nationwide
Median income	\$43,835		\$58,811
Poverty rate	16.50%		15.81%
Below \$25k	28.45%		24.04%
\$25k-\$50k	29.57%		24.58%
\$50k-\$100k	28.75%		30.66%
\$100k-\$200k	12.04%		16.50%
\$200k or more	1.19%		4.21%

Education	Area (%)		Nationwide
High School graduate	81.83%		79.93%
Bachelor's degree or higher	15.35%		24.84%

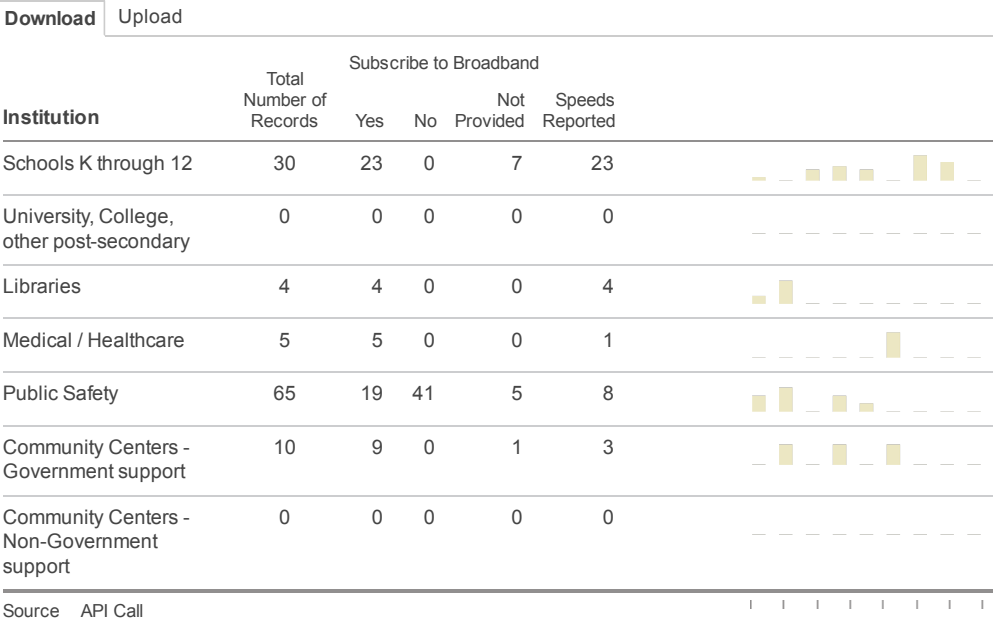
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Broadband Speed Test (Mbps)



Community Anchor Institutions



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Download		Upload	
Speed	Percent Population		Nationwide
Dn>3Mbps Up>768kbps	2.0%	<div><div></div></div>	94.8%
Download > 3Mbps	73.7%	<div><div></div></div>	95.4%
Download > 6Mbps	2.0%	<div><div></div></div>	94.2%
Download > 10Mbps	1.6%	<div><div></div></div>	92.9%
Download > 25Mbps	1.6%	<div><div></div></div>	85.3%
Download > 50Mbps	0.0%	<div><div></div></div>	83.2%
Download > 100Mbps	0.0%	<div><div></div></div>	64.8%
Download > 1Gbps	0.0%	<div><div></div></div>	7.9%
		Source	API Call

Wireless

Download		Upload	
Speed	Percent Population		Nationwide
Dn>3Mbps Up>768kbps	85.1%	<div><div></div></div>	99.3%
Download > 3Mbps	85.1%	<div><div></div></div>	99.3%
Download > 6Mbps	27.8%	<div><div></div></div>	98.5%
Download > 10Mbps	27.8%	<div><div></div></div>	98.2%
Download > 25Mbps	0.0%	<div><div></div></div>	14.0%
Download > 50Mbps	0.0%	<div><div></div></div>	6.6%
Download > 100Mbps	0.0%	<div><div></div></div>	4.3%
Download > 1Gbps	0.0%	<div><div></div></div>	0.1%
		Source	API Call

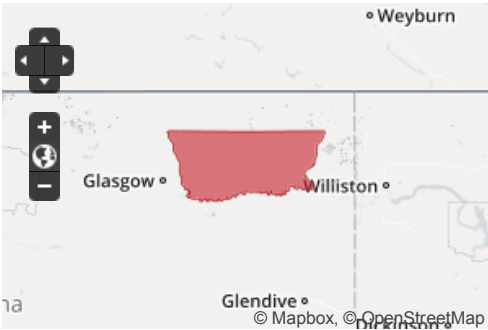
Technology	Percent Population	Nationwide			
DSL	85.7%	90.0%			
Fiber	1.6%	25.4%			
Cable	0.0%	88.8%			
Wireless	95.4%	99.4%			
Other	0.0%	0.0%			
		Source	API Call		

Number of Internet Providers

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Demographics

Total area (sq miles)	3,325
Population	8,791
Housing Units	3,590

Age	Area (%)	Nationwide	
under 5	10.73%	5.73%	
5 - 19	34.55%	20.76%	
20 - 34	23.04%	19.57%	
35 - 59	22.54%	32.66%	
60+	9.14%	21.28%	

Race	Area (%)	Nationwide	
White	18.10%	69.32%	
Black	0.00%	11.19%	
Hispanic	1.07%	14.91%	
Asian/Pacific Islander	0.15%	4.08%	
Native American	80.68%	0.48%	

Income	Area (%)	Nationwide	
Median income	\$39,026	\$58,811	
Poverty rate	25.38%	15.81%	
Below \$25k	32.96%	24.04%	
\$25k-\$50k	31.00%	24.58%	
\$50k-\$100k	28.61%	30.66%	
\$100k-\$200k	6.40%	16.50%	
\$200k or more	1.03%	4.21%	

Education	Area (%)	Nationwide	
High School graduate	77.72%	79.93%	
Bachelor's degree or higher	13.58%	24.84%	

Source API Call

#	Percent Population		Nationwide
0	10.7%	<div><div></div></div>	3.0%
1	87.2%	<div><div></div></div>	8.8%
2	2.1%	<div><div></div></div>	32.4%
3	0.0%	<div><div></div></div>	36.9%
4	0.0%	<div><div></div></div>	13.7%
5	0.0%	<div><div></div></div>	3.6%
6	0.0%	<div><div></div></div>	1.3%
7	0.0%	<div><div></div></div>	0.4%
8+	0.0%	<div><div></div></div>	0.1%

Source API Call

Broadband Speed Test (Mbps)

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Location	Cumulative Tests	25+ percentile	median speed (Mbps)	75+ percentile
Home	5	0.6	<div><div></div></div>	0.9
Schools, Libraries, Community Centers	1			4.7
Medium/Large Business	1			3.8
Small Business	0			
Mobile	10	0.9	<div><div></div></div>	1.8
Other	0			

Source API Call

04.7

Community Anchor Institutions

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Institution	Total Number of Records	Subscribe to Broadband			Speeds Reported	
		Yes	No	Not Provided		
Schools K through 12	18	17	0	1	12	<div><div></div></div>
University, College, other post-secondary	1	0	0	1	0	<div><div></div></div>
Libraries	2	2	0	0	1	<div><div></div></div>
Medical / Healthcare	4	3	0	1	3	<div><div></div></div>
Public Safety	4	0	0	4	0	<div><div></div></div>
Community Centers - Government support	0	0	0	0	0	<div><div></div></div>
Community Centers - Non-Government support	2	0	0	2	0	<div><div></div></div>

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Speed	Percent Population	Nationwide
Dn>3Mbps Up>768kbps	0.8% <div><div></div></div>	94.8%
Download > 3Mbps	0.8% <div><div></div></div>	95.4%
Download > 6Mbps	0.6% <div><div></div></div>	94.2%
Download > 10Mbps	0.6% <div><div></div></div>	92.9%
Download > 25Mbps	0.6% <div><div></div></div>	85.3%
Download > 50Mbps	0.6% <div><div></div></div>	83.2%
Download > 100Mbps	0.0% <div><div></div></div>	64.8%
Download > 1Gbps	0.0% <div><div></div></div>	7.9%

SourceAPI Call

Wireless

Download

Upload

Speed	Percent Population	Nationwide
Dn>3Mbps Up>768kbps	87.3% <div><div></div></div>	99.3%
Download > 3Mbps	87.3% <div><div></div></div>	99.3%
Download > 6Mbps	76.6% <div><div></div></div>	98.5%
Download > 10Mbps	76.6% <div><div></div></div>	98.2%
Download > 25Mbps	0.0% <div><div></div></div>	14.0%
Download > 50Mbps	0.0% <div><div></div></div>	6.6%
Download > 100Mbps	0.0% <div><div></div></div>	4.3%
Download > 1Gbps	0.0% <div><div></div></div>	0.1%

SourceAPI Call

Technology	Percent Population	Nationwide
DSL	41.1% <div><div></div></div>	90.0%
Fiber	0.0% <div><div></div></div>	25.4%
Cable	0.6% <div><div></div></div>	88.8%
Wireless	90.7% <div><div></div></div>	99.4%
Other	0.0% <div><div></div></div>	0.0%

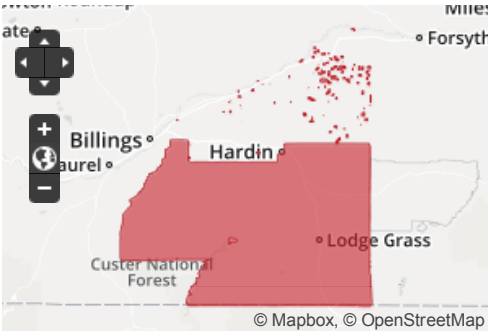
SourceAPI Call

Number of Internet Providers

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Demographics

Total area (sq miles)	3,569
Population	6,391
Housing Units	2,770

Age	Area (%)	Nationwide
under 5	10.54% <div><div></div></div>	5.73%
5 - 19	33.95% <div><div></div></div>	20.76%
20 - 34	23.30% <div><div></div></div>	19.57%
35 - 59	22.32% <div><div></div></div>	32.66%
60+	9.89% <div><div></div></div>	21.28%

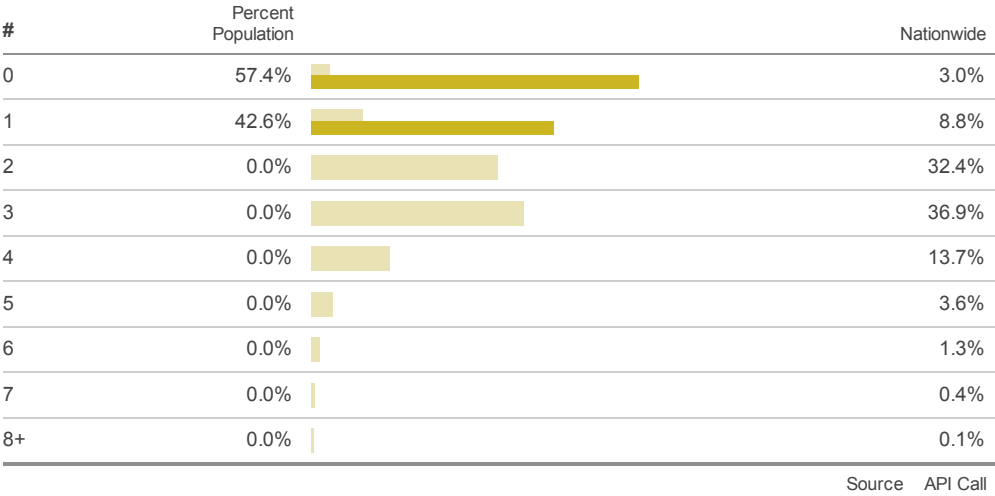
Race	Area (%)	Nationwide
White	13.11% <div><div></div></div>	69.32%
Black	0.00% <div><div></div></div>	11.19%
Hispanic	1.39% <div><div></div></div>	14.91%
Asian/Pacific Islander	0.00% <div><div></div></div>	4.08%
Native American	85.49% <div><div></div></div>	0.48%

Income	Area (%)	Nationwide
Median income	\$43,834	\$58,811
Poverty rate	25.03% <div><div></div></div>	15.81%
Below \$25k	30.04% <div><div></div></div>	24.04%
\$25k-\$50k	32.21% <div><div></div></div>	24.58%
\$50k-\$100k	28.83% <div><div></div></div>	30.66%
\$100k-\$200k	8.57% <div><div></div></div>	16.50%
\$200k or more	0.35% <div><div></div></div>	4.21%

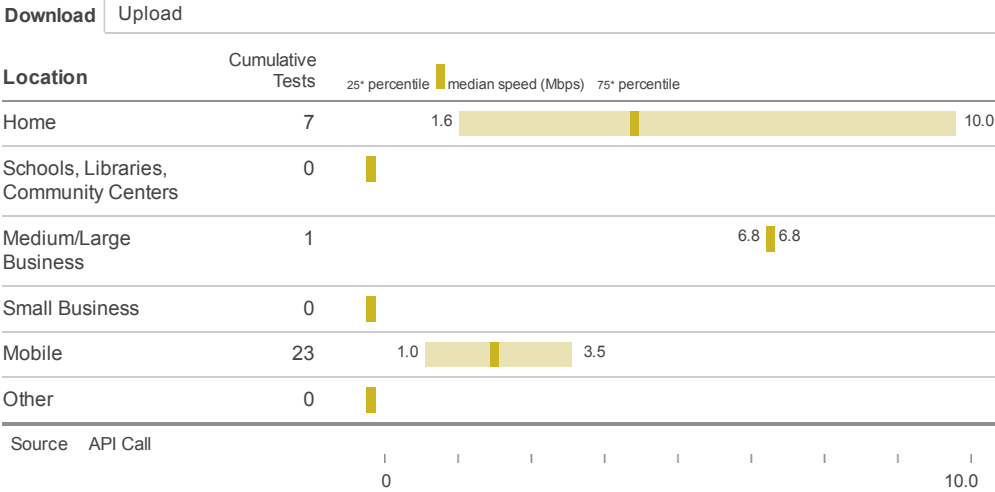
Education	Area (%)	Nationwide
High School graduate	76.97% <div><div></div></div>	79.93%
Bachelor's degree or higher	12.18% <div><div></div></div>	24.84%

Source

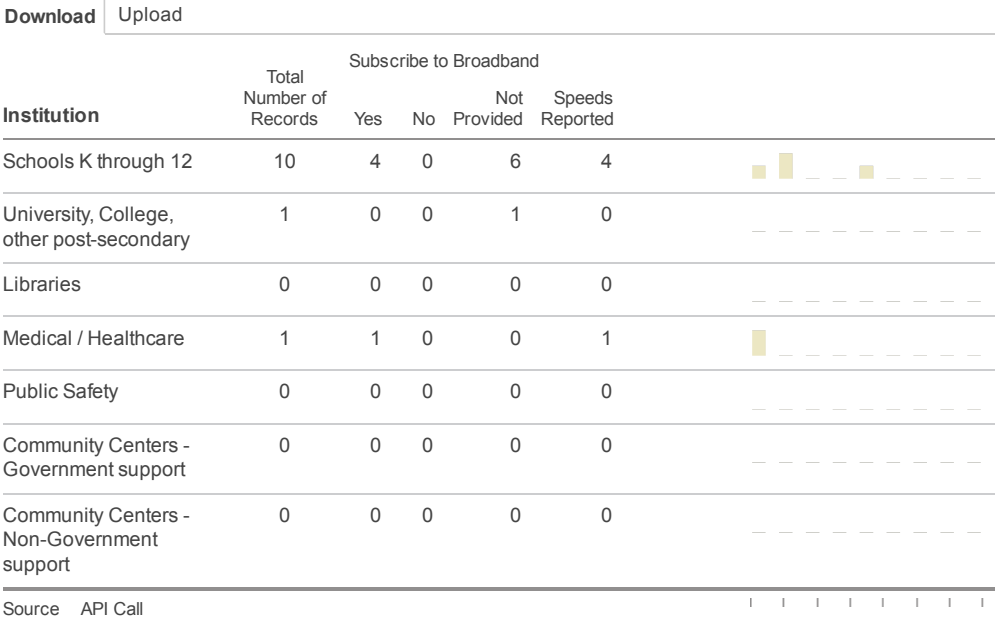
API Call



Broadband Speed Test (Mbps)



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Wireline

<div>DownloadUpload</div>			
Speed	Percent Population		Nationwide
Dn>3Mbps Up>768kbps	83.5%	<div></div>	94.8%
Download > 3Mbps	83.5%	<div></div>	95.4%
Download > 6Mbps	83.5%	<div></div>	94.2%
Download > 10Mbps	81.4%	<div></div>	92.9%
Download > 25Mbps	0.0%	<div></div>	85.3%
Download > 50Mbps	0.0%	<div></div>	83.2%
Download > 100Mbps	0.0%	<div></div>	64.8%
Download > 1Gbps	0.0%	<div></div>	7.9%
		Source	API Call

Wireless

<div>DownloadUpload</div>			
Speed	Percent Population		Nationwide
Dn>3Mbps Up>768kbps	99.4%	<div></div>	99.3%
Download > 3Mbps	99.4%	<div></div>	99.3%
Download > 6Mbps	99.3%	<div></div>	98.5%
Download > 10Mbps	99.3%	<div></div>	98.2%
Download > 25Mbps	0.0%	<div></div>	14.0%
Download > 50Mbps	0.0%	<div></div>	6.6%
Download > 100Mbps	0.0%	<div></div>	4.3%
Download > 1Gbps	0.0%	<div></div>	0.1%
		Source	API Call

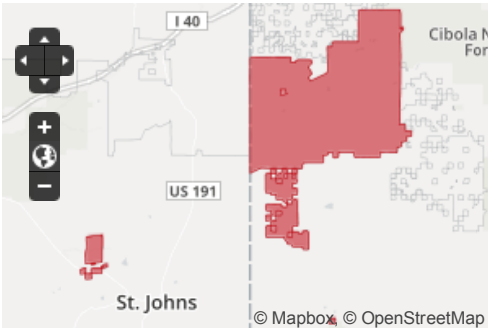
Technology	Percent Population		Nationwide
DSL	86.1%	<div></div>	90.0%
Fiber	0.0%	<div></div>	25.4%
Cable	0.0%	<div></div>	88.8%
Wireless	99.4%	<div></div>	99.4%
Other	0.0%	<div></div>	0.0%
		Source	API Call

Number of Internet Providers

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Demographics

Total area (sq miles)	709
Population	8,245
Housing Units	2,326

Age	Area (%)		Nationwide
under 5	7.91%	<div></div>	5.73%
5 - 19	25.58%	<div></div>	20.76%
20 - 34	23.39%	<div></div>	19.57%
35 - 59	31.33%	<div></div>	32.66%
60+	11.80%	<div></div>	21.28%

Race	Area (%)		Nationwide
White	1.50%	<div></div>	69.32%
Black	0.00%	<div></div>	11.19%
Hispanic	2.25%	<div></div>	14.91%
Asian/Pacific Islander	0.23%	<div></div>	4.08%
Native American	96.02%	<div></div>	0.48%

Income	Area (%)		Nationwide
Median income	\$33,508		\$58,811
Poverty rate	32.54%	<div></div>	15.81%
Below \$25k	38.11%	<div></div>	24.04%
\$25k-\$50k	32.76%	<div></div>	24.58%
\$50k-\$100k	22.29%	<div></div>	30.66%
\$100k-\$200k	6.08%	<div></div>	16.50%
\$200k or more	0.75%	<div></div>	4.21%

Education	Area (%)		Nationwide
High School graduate	63.40%	<div></div>	79.93%
Bachelor's degree or higher	4.85%	<div></div>	24.84%

Source API Call

#	Percent Population		Nationwide
0	13.9%	<div><div></div></div>	3.0%
1	86.1%	<div><div></div></div>	8.8%
2	0.0%	<div><div></div></div>	32.4%
3	0.0%	<div><div></div></div>	36.9%
4	0.0%	<div><div></div></div>	13.7%
5	0.0%	<div><div></div></div>	3.6%
6	0.0%	<div><div></div></div>	1.3%
7	0.0%	<div><div></div></div>	0.4%
8+	0.0%	<div><div></div></div>	0.1%

Source API Call

Broadband Speed Test (Mbps)

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Location	Cumulative Tests	25 th percentile	median speed (Mbps)	75 th percentile
Home	1			1.0
Schools, Libraries, Community Centers	0			
Medium/Large Business	1			1.0
Small Business	0			
Mobile	11	0.2		0.5
Other	0			

Source API Call

0 1.0

Community Anchor Institutions

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Institution	Total Number of Records	Subscribe to Broadband				Speeds Reported
		Yes	No	Not Provided		
Schools K through 12	6	3	0	3		3
University, College, other post-secondary	0	0	0	0		0
Libraries	1	1	0	0		1
Medical / Healthcare	2	0	0	2		0
Public Safety	4	0	0	4		0
Community Centers - Government support	1	0	0	1		0
Community Centers - Non-Government support	0	0	0	0		0

Source API Call

0 1.0

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Wireline

Download Upload			
Speed	Percent Population		Nationwide
Dn>3Mbps Up>768kbps	26.1%		94.8%
Download > 3Mbps	27.2%		95.4%
Download > 6Mbps	19.4%		94.2%
Download > 10Mbps	18.6%		92.9%
Download > 25Mbps	3.8%		85.3%
Download > 50Mbps	1.1%		83.2%
Download > 100Mbps	1.1%		64.8%
Download > 1Gbps	0.0%		7.9%
		Source	API Call

Wireless

Download Upload			
Speed	Percent Population		Nationwide
Dn>3Mbps Up>768kbps	55.8%		99.3%
Download > 3Mbps	55.8%		99.3%
Download > 6Mbps	48.0%		98.5%
Download > 10Mbps	47.8%		98.2%
Download > 25Mbps	0.0%		14.0%
Download > 50Mbps	0.0%		6.6%
Download > 100Mbps	0.0%		4.3%
Download > 1Gbps	0.0%		0.1%
		Source	API Call

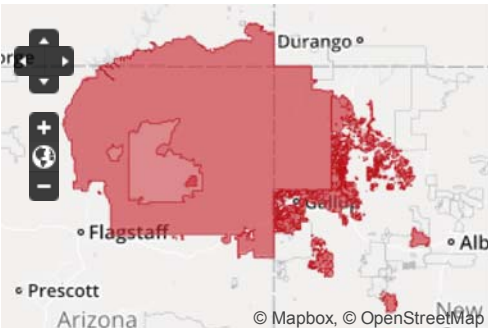
Technology	Percent Population		Nationwide
DSL	59.2%		90.0%
Fiber	0.2%		25.4%
Cable	0.2%		88.8%
Wireless	62.4%		99.4%
Other	0.0%		0.0%
		Source	API Call

Number of Internet Providers

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Demographics

Total area (sq miles)	23,294
Population	161,251
Housing Units	71,445

Age	Area (%)		Nationwide
under 5	8.48%		5.73%
5 - 19	31.11%		20.76%
20 - 34	24.89%		19.57%
35 - 59	24.41%		32.66%
60+	11.11%		21.28%

Race	Area (%)		Nationwide
White	1.47%		69.32%
Black	0.02%		11.19%
Hispanic	1.50%		14.91%
Asian/Pacific Islander	0.08%		4.08%
Native American	96.93%		0.48%

Income	Area (%)		Nationwide
Median income	\$28,039		\$58,811
Poverty rate	29.38%		15.81%
Below \$25k	49.29%		24.04%
\$25k-\$50k	24.79%		24.58%
\$50k-\$100k	20.43%		30.66%
\$100k-\$200k	5.07%		16.50%
\$200k or more	0.42%		4.21%

Education	Area (%)		Nationwide
High School graduate	56.40%		79.93%
Bachelor's degree or higher	6.67%		24.84%

Source API Call

Wireline **Wireless**

#	Percent Population	Nationwide
0	38.8%	3.0%
1	58.6%	8.8%
2	2.6%	32.4%
3	0.0%	36.9%
4	0.0%	13.7%
5	0.0%	3.6%
6	0.0%	1.3%
7	0.0%	0.4%
8+	0.0%	0.1%

Source	API Call
--------	----------









Broadband Speed Test (Mbps)

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Location	Cumulative Tests	25 th percentile	median speed (Mbps)	75 th percentile
Home	40	0.8	3.1	
Schools, Libraries, Community Centers	1			89.3
Medium/Large Business	5	1.2	2.9	
Small Business	0			
Mobile	237	0.1	1.5	
Other	0			

Community Anchor Institutions

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Institution	Total Number of Records	Subscribe to Broadband				Speeds Reported
		Yes	No	Not Provided		
Schools K through 12	89	38	0	51	33	
University, College, other post-secondary	18	5	0	13	5	
Libraries	10	4	0	6	4	
Medical / Healthcare	42	9	0	33	9	
Public Safety	37	1	0	36	1	
Community Centers - Government support	76	50	1	25	30	
Community Centers - Non-Government support	3	3	0	0	3	
Source	API Call					

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Wireline

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Speed	Percent Population		Nationwide
Dn>3Mbps Up>768kbps	0.0%		94.8%
Download > 3Mbps	0.0%		95.4%
Download > 6Mbps	0.0%		94.2%
Download > 10Mbps	0.0%		92.9%
Download > 25Mbps	0.0%		85.3%
Download > 50Mbps	0.0%		83.2%
Download > 100Mbps	0.0%		64.8%
Download > 1Gbps	0.0%		7.9%
		Source	API Call

Wireless

<div>DownloadUpload</div>			
Speed	Percent Population		Nationwide
Dn>3Mbps Up>768kbps	15.6%		99.3%
Download > 3Mbps	15.6%		99.3%
Download > 6Mbps	15.6%		98.5%
Download > 10Mbps	15.6%		98.2%
Download > 25Mbps	0.0%		14.0%
Download > 50Mbps	0.0%		6.6%
Download > 100Mbps	0.0%		4.3%
Download > 1Gbps	0.0%		0.1%
		Source	API Call

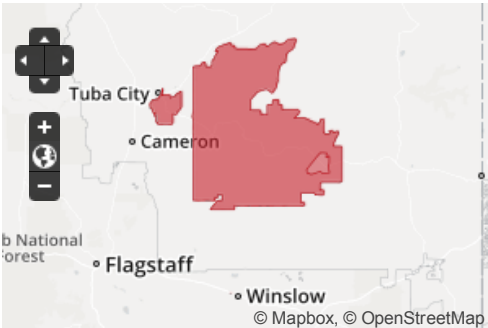
Technology	Percent Population		Nationwide
DSL	74.7%		90.0%
Fiber	0.0%		25.4%
Cable	0.0%		88.8%
Wireless	16.0%		99.4%
Other	0.0%		0.0%
		Source	API Call

Number of Internet Providers

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Demographics

Total area (sq miles)	2,463
Population	6,593
Housing Units	2,798

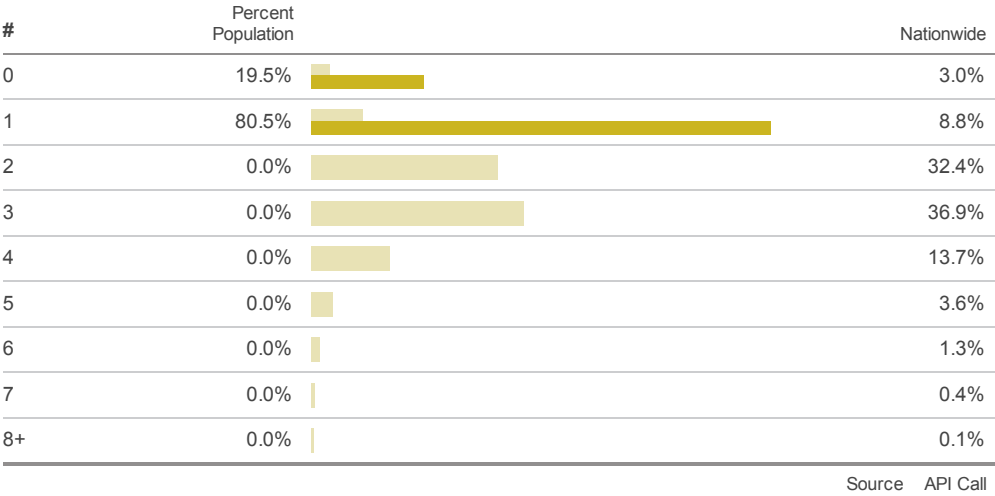
Age	Area (%)		Nationwide
under 5	8.25%		5.73%
5 - 19	28.79%		20.76%
20 - 34	22.60%		19.57%
35 - 59	25.53%		32.66%
60+	14.84%		21.28%

Race	Area (%)		Nationwide
White	2.55%		69.32%
Black	0.00%		11.19%
Hispanic	1.35%		14.91%
Asian/Pacific Islander	0.08%		4.08%
Native American	96.02%		0.48%

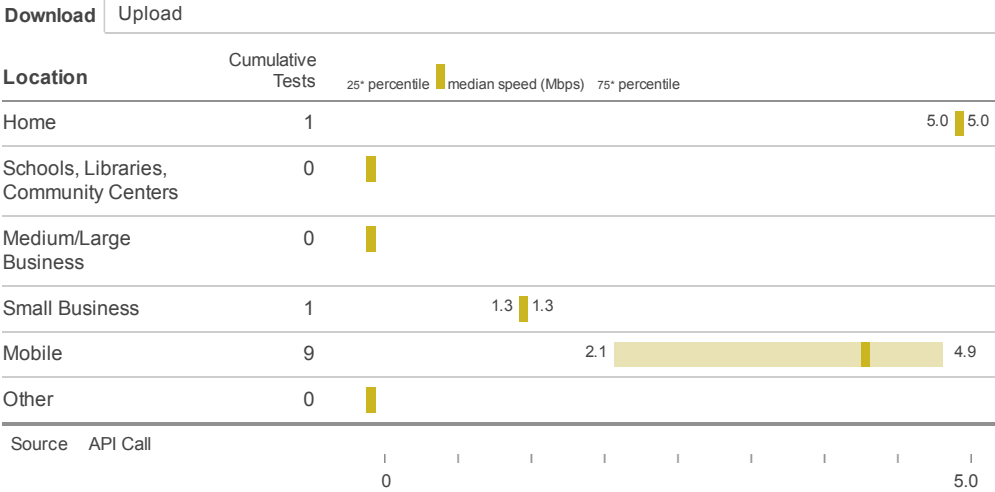
Income	Area (%)		Nationwide
Median income	\$37,983		\$58,811
Poverty rate	27.23%		15.81%
Below \$25k	34.76%		24.04%
\$25k-\$50k	34.77%		24.58%
\$50k-\$100k	25.59%		30.66%
\$100k-\$200k	4.21%		16.50%
\$200k or more	0.67%		4.21%

Education	Area (%)		Nationwide
High School graduate	65.91%		79.93%
Bachelor's degree or higher	7.94%		24.84%

Source API Call



Broadband Speed Test (Mbps)



Community Anchor Institutions

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Institution	Total Number of Records	Subscribe to Broadband			Speeds Reported	
		Yes	No	Not Provided		
Schools K through 12	2	1	0	1	1	<div><div></div></div>
University, College, other post-secondary	1	0	0	1	0	<div><div></div></div>
Libraries	1	1	0	0	1	<div><div></div></div>
Medical / Healthcare	2	0	0	2	0	<div><div></div></div>
Public Safety	4	0	0	4	0	<div><div></div></div>
Community Centers - Government support	4	1	0	3	1	<div><div></div></div>
Community Centers - Non-Government support	0	0	0	0	0	<div><div></div></div>

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Speed	Percent Population		Nationwide
Dn>3Mbps Up>768kbps	44.0%	<div></div>	94.8%
Download > 3Mbps	84.5%	<div></div>	95.4%
Download > 6Mbps	1.9%	<div></div>	94.2%
Download > 10Mbps	1.9%	<div></div>	92.9%
Download > 25Mbps	0.9%	<div></div>	85.3%
Download > 50Mbps	0.9%	<div></div>	83.2%
Download > 100Mbps	0.0%	<div></div>	64.8%
Download > 1Gbps	0.0%	<div></div>	7.9%

Source

API Call

Wireless

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Speed	Percent Population		Nationwide
Dn>3Mbps Up>768kbps	10.7%	<div></div>	99.3%
Download > 3Mbps	10.7%	<div></div>	99.3%
Download > 6Mbps	10.7%	<div></div>	98.5%
Download > 10Mbps	10.7%	<div></div>	98.2%
Download > 25Mbps	0.0%	<div></div>	14.0%
Download > 50Mbps	0.0%	<div></div>	6.6%
Download > 100Mbps	0.0%	<div></div>	4.3%
Download > 1Gbps	0.0%	<div></div>	0.1%

Source

API Call

Technology	Percent Population		Nationwide
DSL	86.3%	<div></div>	90.0%
Fiber	0.0%	<div></div>	25.4%
Cable	0.9%	<div></div>	88.8%
Wireless	12.8%	<div></div>	99.4%
Other	0.0%	<div></div>	0.0%

Source

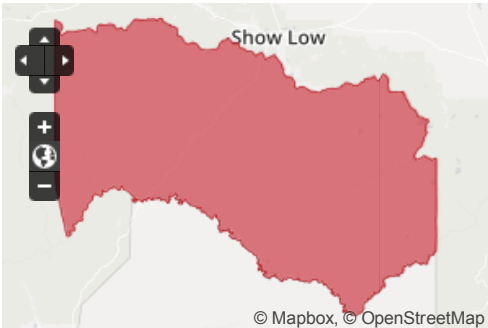
API Call

Number of Internet Providers

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Demographics

Total area (sq miles)	2,601
Population	14,070
Housing Units	4,737

Age	Area (%)		Nationwide
under 5	9.38%	<div></div>	5.73%
5 - 19	31.43%	<div></div>	20.76%
20 - 34	24.42%	<div></div>	19.57%
35 - 59	24.52%	<div></div>	32.66%
60+	10.25%	<div></div>	21.28%

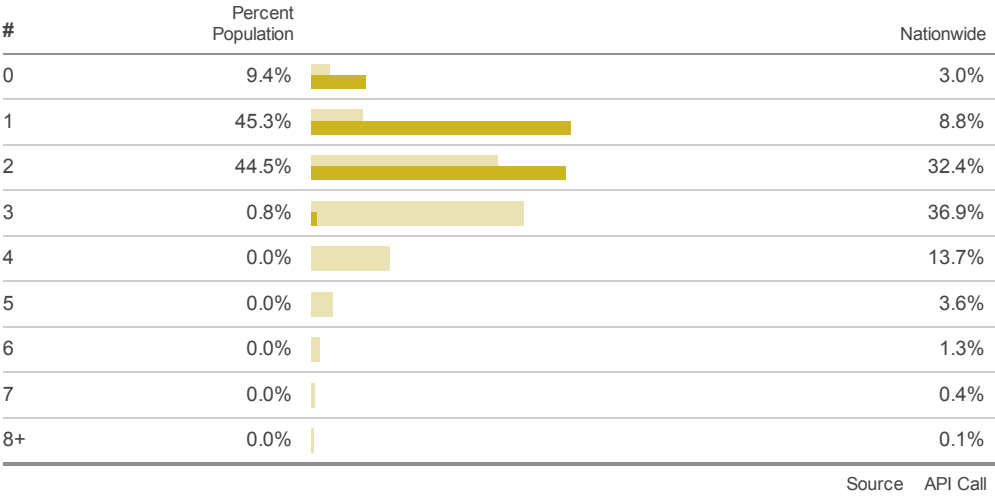
Race	Area (%)		Nationwide
White	3.24%	<div></div>	69.32%
Black	0.00%	<div></div>	11.19%
Hispanic	2.12%	<div></div>	14.91%
Asian/Pacific Islander	0.36%	<div></div>	4.08%
Native American	94.27%	<div></div>	0.48%

Income	Area (%)		Nationwide
Median income	\$29,315		\$58,811
Poverty rate	27.15%	<div></div>	15.81%
Below \$25k	50.51%	<div></div>	24.04%
\$25k-\$50k	22.03%	<div></div>	24.58%
\$50k-\$100k	22.08%	<div></div>	30.66%
\$100k-\$200k	5.28%	<div></div>	16.50%
\$200k or more	0.10%	<div></div>	4.21%

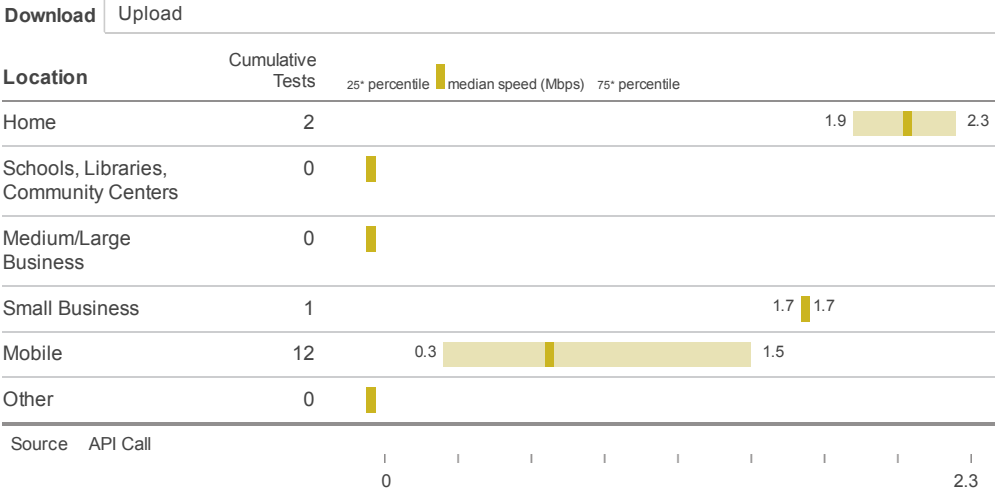
Education	Area (%)		Nationwide
High School graduate	53.40%	<div></div>	79.93%
Bachelor's degree or higher	4.08%	<div></div>	24.84%

Source

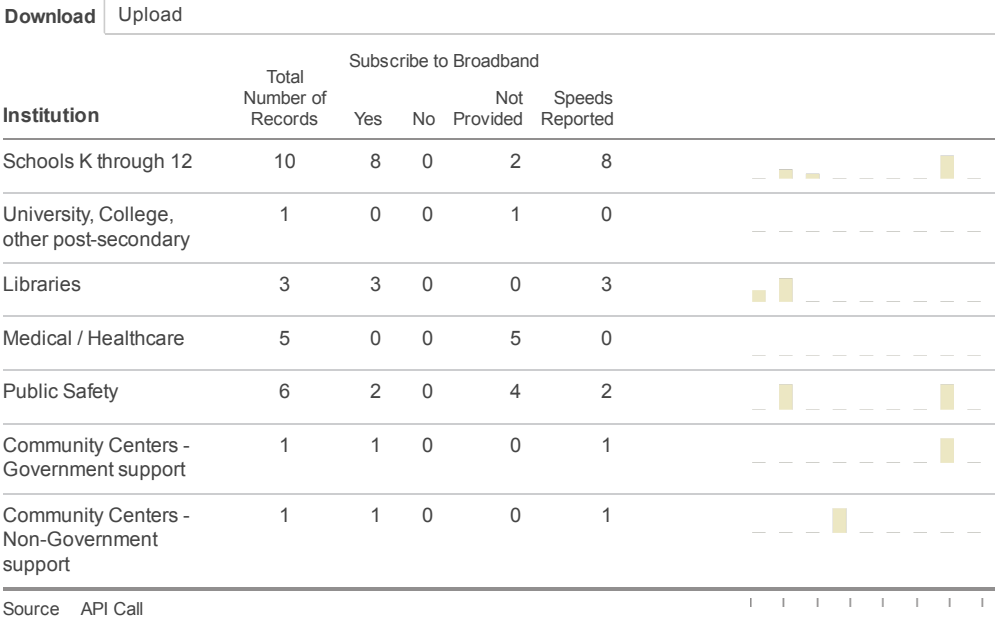
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